

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

UNITED FOOD AND COMMERCIAL
WORKERS UNION, LOCAL No. 663, *et al.*,

Case No. 18-cv-2660 (JNE/TNL)

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
AGRICULTURE,

Defendant.

DECLARATION OF JOSE QUINONEZ

I, Jose Quinonez, declare as follows:

1. My name is Jose Quinonez. I currently work as a tongue x-ray operator on the kill floor at the Seaboard Foods pork plant in Guymon, Oklahoma.
2. I have worked at Seaboard for almost 12 years. I have worked as a tongue x-ray operator for 11 years and prior to that I was a reconditioner (I picked up meat from the floor).
3. I have been a member of UFCW Local 2 for approximately 12 years.
4. I also am a walking steward for UFCW Local 2.
5. As a walking steward I am the person on the production floor who serves as a liaison between union member workers and management.
6. I also am in charge of documenting the line speed and documenting breaks for UFCW Local 2. I have been doing this almost 11 years.
7. In 2019 and before, the lines ran consistently at approximately 1086 hogs per hour.

8. In 2020, the line speeds have increased. Before the COVID-19 epidemic, they were running at approximately 1200 hogs per hour.

9. In my job as a tongue X-ray operator, I stand next to the X-ray and examine the bases of tongues. If there is skin, hair or any other part of the tongue that is not meat, I remove it with a knife.

10. In this job we use a knife number 14, which is a long blade of approximately six inches. Typically there are four of us per table, all using these knives and quickly removing hair, skin and other things from tongues.

11. I experience pain in my hands from the repetitive motion.

12. The faster the lines go, the more pain I feel in my hands and, since the lines sped up, I can now feel pain in my shoulders.

13. I have seen others injured as a result of fast line speeds. For example, hogs falling off the chain on the kill floor injure workers. When the lines run faster, the hogs are more likely to fall off and workers are more likely to get injured.

14. As the plant increased line speeds in 2020 it did not change hours or hire more workers. We are the same number of people doing the same job at a faster rate, handling a larger volume of product.

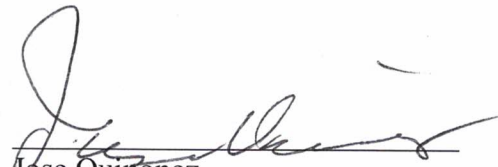
15. Since COVID-19, production has slowed. During COVID-19, the plant slowed to less than 900 hogs per hour.

16. Recently, the plant has indicated they want to return to full capacity and gradually is returning to full capacity. One day this week, for example, I timed that the lines were running at 1113 hogs per hour.

17. Based on my experience in the plant, I believe that as line speeds increase I and my coworkers will suffer a higher rate of ergonomic injuries.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 01/13 2020 8/6
06/3/2020 —

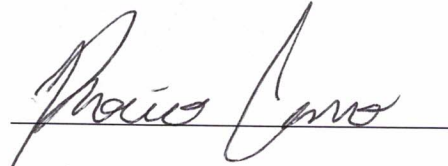

Jose Quinonez

TRANSLATOR'S CERTIFICATION

I, Rocio Cano, am fluent in English and Spanish. I read this declaration to Jose Quinonez in Spanish and he confirmed that its contents were true and correct.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 03 2020.


Rocio Cano